



UNITED STATES GOVERNMENT PRINTING OFFICE
OFFICE OF THE INSPECTOR GENERAL

memorandum

DATE: September 30, 2003

REPLY TO

ATTN OF: Supervisory Auditor, Office of Audits

SUBJECT: Audit of the FDLP Inspections Program

TO: Superintendent of Documents

THROUGH: Deputy Superintendent of Documents
Director, Library Programs Service

The Federal Depository Library Program's inspection program is an integral part of the depository library system. This program provides the only on-site investigation of depository libraries regularly made by the government. GPO administers its library inspection program in accordance with the external policy of Title 44 U.S.C. and the internal policies established. In Fiscal Year (FY) 2002 a total of 1,297 libraries were officially designated libraries in the depository library system.

The primary objective of this audit was to evaluate the most significant control issues in the current environment of Library Programs Service (LPS) as it related to the subprogram of depository library inspections and report their status. We acknowledged excellent library response in a key reporting area, but also noted several other areas where controls could be improved.

As a result, the audit identified 4 findings and made 13 recommendations to strengthen the LPS environment. The Director, LPS, and the Chief, Library Division, agreed with the recommendations. Management comments are summarized via an Appendix at the end of this report.

Mr. David Schaub, Supervisory Auditor, and Ms. Tracie Briggs, Staff Auditor, conducted this audit. The OIG appreciates the prompt cooperation and courtesies extended during the audit by the officials and staff of the Superintendent of Documents and LPS.

MARC A. NICHOLS
INSPECTOR GENERAL

By: _____

David B. Schaub, Supervisory Auditor
Attachment

**REPORT ON THE FEDERAL DEPOSITORY LIBRARY INSPECTION
PROGRAM**

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RESULTS IN BRIEF

The Federal Depository Library Program (FDLP)'s inspection program is the only on-site investigation of depository libraries regularly made by the government. It is regulated by Title 44 U.S.C. Chapter 19, which justifies a depository library inspection program.

The primary objective of this audit was to evaluate the most significant control issues in the current environment of the GPO Information Dissemination (formerly known as Superintendent of Documents, or SuDocs) FDLP as it related to the basic function of depository library inspections, managed by Library Programs Service (LPS), and report their status. These issues were identified by a detailed risk analysis that was prepared by the Office of the Inspector General (OIG) audit team during and after their review of control practices performed.

Our secondary objectives were to determine to what extent GPO complies with applicable Title 44 laws and regulations, and to assess the status of current internal controls throughout the LPS as it interacts with depository libraries throughout the nation.

Opportunities exist to improve internal controls over this program. The OIG identified the following conditions needing improvement:

1. Library inspections are not precisely defined. The applicable section of Title 44, Section 1909, needs revision. Specific requirements that do not account for the existence of CD-ROMs, for an example, can be considered unrealistic in the modern library environment;
2. The library inspections process, which usually consists of a self-study, a self-study evaluation, an on-site inspection, and an inspection report, is currently very time-consuming and could be made more efficient;
3. Time management of LPS inspectors is not carefully documented and needs improved operating procedures; and
4. The automated system in LPS that governs key library data is antiquated and needs upgrading.

The Superintendent of Documents should take necessary steps to:

1. Develop proposed amendments to Title 44 language that will make three specific changes to Section 1909;

2. Construct and monitor an on-line database feature that will automatically notify management when the time span between individual library reviews has become excessive;
3. Streamline the inspection procedure by generating automatic reminder notices, via either letter or e-mail, notifying libraries to keep in contact about progress being made with their current reporting requirements;
4. Re-evaluate written self-study procedures in Supplement 3, "Self-Study of a Federal Depository Library," and reduce the processes needed to evaluate each category;
5. Revise LPS' operating procedures to highlight those libraries with previous non-compliance ratings, especially in multiple categories, so that on-site inspections of libraries can be prioritized;
6. Utilize data gathered from Biennial Surveys as a linkage to the self-study and inspection program to enhance communication of library status;
7. Prepare updated standard written operating procedures to institute a complete time accountability form to be prepared by Inspectors, accounting for all hours worked, and reviewed by a supervisor on a regular basis;
8. Pay overtime to Inspectors at grades below PG-14, according to GPO Instruction 640.7C, for overtime they work in the future;
9. Monitor non-inspection work by Inspectors to assure it remains below a level of 10-15 percent, or consider having this work performed by lower-graded staff where available;
10. Request enhancements or updates to PAMALA that will provide improved inspection report tracking;
11. Ensure that requested enhancements or updates to PAMALA will also allow for improved self-study report and self-study evaluation tracking;
12. Ensure that access to any new or enhanced system is installed on computers for each Inspector in order to enable multiple accesses for greater efficiency; and
13. Review subsequent data entries into LANYASIS (or its replacement) by Inspectors, in compliance with LPS' internal manual requirements, to ensure complete, thorough, and accurate documentation of inspection visits.

This audit report contains 13 recommendations directed to the Superintendent of Documents to strengthen internal controls over the library inspection program. In several instances, management has responded promptly to the OIG draft recommendations and has begun to take action to remedy conditions that were problematic.

BACKGROUND

The GPO FDLP provides depository libraries throughout the United States with Federal government information. Government publications selected from lists prepared by SuDocs, when requested, are distributed to depository libraries that are specifically designated by law, according to United States Code (U.S.C.) Title 44, Sections 1905 through 1908, 1912, 1915 and 1916. Reports on the condition of these designated libraries are required at least every two years by 44 U.S.C. Section 1909 and are summarized in a Biennial Survey report by LPS. Where the need is indicated, Section 1909 provides that: "...The Superintendent of Documents shall make firsthand investigation of conditions...and include these results of investigations in his annual report." GPO identifies Depository Library Inspectors as personnel who represent the Superintendent and act as liaisons between GPO and Federal depository libraries.

GPO administers the library inspection program in accordance with Title 44 U.S.C. and regulations and policies promulgated thereunder. In Fiscal Year (FY) 2002 a total of 1,297 libraries were officially designated in the program, a 1.2 percent decrease from the prior year.

LPS management has been examining the inspection program to make any necessary improvements to the internal controls and procedures. SuDocs management is also in the process of planning several significant changes to the process in FY 2004.

OBJECTIVES, SCOPE, AND METHODOLOGY

This audit began in April 2003 and was concluded in August 2003; it was a resumption of an audit that was suspended. It was performed in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States. The methodology we used consisted of interviews, conferences, on-line queries and Internet data retrieval, observation, data mining, audit sampling of self-study and inspection reports, and examination of documents, including review of specially requested self-study evaluations, inspection reports, and LPS Monthly Output Statistics Reports.

In addition, we reviewed the following publications and instructions that contained policy and procedures followed by LPS personnel:

- U.S. Code Title 44, Chapter 19, to define authorities and responsibilities regarding Government publications, their availability and distribution to designated depository libraries, and reports on conditions of these libraries;
- “Instructions To Depository Libraries,” revised July 2000, to identify essential information regarding depository library guidance;
- GPO Instruction 825.18A *Internal Control Program* to identify policies, standards, and responsibilities for conducting internal control reviews of GPO programs;
- Federal Depository Library Manual, Supplement 3, Revised, “Self-Study of a Federal Depository Library,” to explain the purpose and procedures for self-studies that are evaluated by inspectors; and
- “On The Road And In The Office: The Depository Inspector At Work,” an in-house guide for inspectors on how to prepare for inspections.

As part of our methodology, we accepted and analyzed a random sample of self-study reports, self-study evaluations, and inspection reports extracted by the prior OIG audit team that performed preliminary background and survey work on this audit.

In the course of our work, we also assessed the susceptibility of various aspects of the depository library inspection program to fraud, waste, and abuse.

FINDINGS AND RECOMMENDATIONS

1. SECTION 1909 OF TITLE 44 NEEDS REVISION

BACKGROUND

SuDocs management stated that they are required to have a library inspection program by Title 44 U.S.C. Section 1909. A review of Section 1909, **“Requirements of depository libraries; reports on conditions; investigations; termination; replacement”** references library inspections indirectly by stating in the second paragraph of Section 1909 that:

“The Superintendent of Documents shall make firsthand investigation of conditions for which need is indicated and include the results of investigations in his annual report.”

FINDING

The audit team reviewed Section 1909 and, based on interviews with LPS management, we believe this Section could be improved if it were amended in at least 3 areas:

- Size of depository libraries;
- Description of a library’s contents (i.e. “books” vs. multimedia); and
- Timeframe for corrective action by libraries on their conditions.

We reviewed all of Chapter 19, “Depository Library Program,” including Section 1909, and noted that the term “inspection” is neither used nor defined. This Section also refers to specific depository library requirements in ways that can be considered unrealistic in the modern library environment. For example, in the same second paragraph of Section 1909 cited above, the language goes on to state in pertinent part:

“...When he [the Superintendent] ascertains that the number of books in a depository library is below ten thousand...he shall delete the library from the list of depository libraries if the library fails to correct the unsatisfactory conditions within six months.”

When we discussed this language with LPS management in SuDocs, they acknowledged that the wording does not adequately account for the multimedia of modern depository libraries. In the first place, according to the Chief, Library Division, a library with only 10,000 books would be considered a very small

library today. For example, we reviewed a table of January 2000 Item Selection Rate Averages for Selective Depository Libraries Based on New Size Definitions, revised January 16, 2002. It states: "Size designations are based on the number of cataloged and uncataloged items in the library system. Depository and non-depository materials, all formats and all collections under the purview of the depository library director are included."¹ LPS managers agreed that the definition of "books" is also limiting, as it does not take into account the existence of CD-ROMs and other modern media.

Furthermore, the audit team agreed with the Chief, Depository Services, that six months is an unrealistic time frame within which a modern depository library could be expected to respond in order to correct unsatisfactory conditions. The Chief told the OIG auditors that the modern process of self-study reports, self-study evaluations, on-site inspections and their resultant reports take at least nine months and, in some cases, can be considerably longer. We confirmed this claim in our sampling of recent self-studies and inspections. [Refer to Finding #2 for further details.]

SuDocs has interpreted Section 1909 as giving it the authority to conduct inspections. This specific requirement has been cited as far back as the Depository Library Council's First Report to the Public Printer in 1976 which stated: "...Inspection of depository libraries by GPO is specifically required by USC 44...." The Superintendent acknowledged that she does not conduct "firsthand investigations" as stated in Section 1909, but that they are conducted via her delegated LPS Inspectors. When the Inspectors determine that a problem with the library is identified, they work with the library to alleviate the conditions; as a last resort, GPO puts the library on probation.

SuDocs management told us that there have been larger-scale attempts to change Title 44 language that would enable them to update and modify both the library inspections program and many other areas. According to LPS, they were told that allowing modifications in this area would require modifications throughout Title 44, and this has been rejected. GPO's Administrative Law Judge told us that there have been many minor changes to Title 44 over the years. He advised us that if SuDocs desired to effect changes to the inspection program, the effective approach is to focus it more clearly by making very specific suggestions.

Due to the constraints of outdated language in Title 44, the library inspections program exists with several restrictions. Section 1909 of Title 44 is losing its applicability due to the changing nature of the definition of books and

¹ Small = < 250,000
Medium = 250,001 – 1,000,000
Large = > 1,000,000 "

the officially allowable time frame for depository libraries to correct conditions with which they are in non-compliance.

GPO Instruction 825.18A *Internal Control Program*, Standard 1 states:

“All program operations, obligations, and costs must be in compliance with applicable laws and regulations. Resources should be efficiently and effectively allocated for duly authorized purposes.”

For example, the Superintendent stated that, according to a May 2003 report of Depository Library Titles, 86 percent of the new titles were electronic. The Director, LPS, pointed out that May was an unusual month, but confirmed that as of August 2003, 63 percent of all new titles were electronic for this fiscal year.² Also, the Superintendent confirmed comments made by the Public Printer at a Depository Library Council meeting in April 2003, where he noted that 67 percent of the information resources in the FDLP are now available only electronically.

Modifications to Section 1909 that would account for the modern environment may become more significant as long as the depository library community loses members. In a presentation at the last Federal Depository Library Conference in October 2002, the Director, LPS, noted that 19 libraries left the depository system in FY 2002, mostly with no advance notice. Since then, at least another 16 libraries have left the system (per the June 2003 LPS Monthly Output Statistics Report).

RECOMMENDATION

The Superintendent of Documents should take the necessary actions to develop proposed amendments to the language of Section 1909 that will account for (a) the changing definition of “size”; (b) the transition from “books” to electronic document formats taking place; and (c) the unrealistic six-month response time limit for modern depository libraries. These amendments should be proposed to the Public Printer for action (0306-01).

MANAGEMENT COMMENTS

The Superintendent of Documents agreed with the finding and recommendation, but had several qualifying comments. Refer to Appendix I for details.

² The huge increase in titles in May 2003 was due to an increase of 4,827 titles on the DOE Information Bridge, according to the August 2003 Titles Report provided by the Director, LPS.

2. THE INSPECTION AND SELF-STUDY PROCESS NEEDS TO BE MORE EFFICIENT

BACKGROUND

There are two ways in which depository libraries are reviewed in the current environment: (1) on-site inspections and (2) self-study reviews. On-site inspections are the traditional method, conducted by a GPO Inspector at the library. There are eight compliance categories in which libraries are rated during an on-site inspection:

- I. Collection Development
- II. Bibliographic Control
- III. Maintenance
- IV. Human Resources
- V. Physical Facilities
- VI. Public Service
- VII. Cooperative Efforts
- VIII. Regional Services

A library will be placed on probation if they are determined to be in non-compliance with Category VI or in three or more other categories during an on-site inspection. According to the Inspectors we interviewed, it is the library's responsibility to inform GPO about progress being made in their noncompliant areas so that probation can be lifted.

Self-study reports are prepared when libraries review themselves and forward the results to the inspectors. Although libraries use the same eight categories for compliance that are used in inspections, a library cannot be placed on probation based on a self-study. Instead, a self-study is used to determine whether a follow-up on-site inspection is necessary. SuDocs documentation prepared for the depositories indicates that 50 percent of self-study evaluations will result in on-site visits. Once a library receives a completed self-study report from SuDocs, they have 90 days to complete it. When an Inspector receives the completed package from the library, they are expected to write a letter back to the library acknowledging its receipt. The Inspector then has 90 days to evaluate the report and determine if an on-site inspection is needed. This part of the process culminates with the GPO Inspectors preparing a written self-study evaluation of the library's self-study report.

Self-studies are required by GPO, although not mandated by Title 44. Federal Depository Manual Supplement 3 (Revised), "Self-Study of a Federal Depository Library (1999 Edition)" states:

"This self-study has been developed as a component of the GPO's inspection of each depository library's Federal documents operation

‘where need is indicated’ under 44 U.S.C. Section 1909. Depositories will perform a mandatory self-evaluation that, in some cases, replaces an on-site inspection....Each year, LPS will request self-studies from a group of libraries in chronological order from the date of last inspection...Inspectors will evaluate each self-study.”

The self-study program was adopted in Fiscal Year 1996. According to the Superintendent, a premise of the self-study function was that Inspectors would communicate with libraries more often. The self-study guide (Federal Depository Manual Supplement 3) provides an option that states that any library may conduct a self-study at any time.

Upon review of a sampling of self-studies and inspection reports, we found that the format and timing of the complete self-study and inspection process varies widely. The audit team reviewed the results of self-studies and/or inspections conducted on 15 libraries where a self-study or an inspection (or both) were completed within FY 2001-02. The time span from the conclusion of the prior inspection to the current review was significant in many cases. The time noted between the date of the last inspection by GPO³ and the date of the GPO Inspector’s self-study evaluation indicated that the average time span was approximately 6 years, 9 months. However, 4 of the 15 libraries (or 27%) revealed that their last inspection was 8 years ago or more.

The Chief, Depository Services, also expressed the opinion that self-studies were created so that Inspectors would not have to travel as much. When the Chief was asked whether the libraries honestly completed their self-studies, she replied that she did not think they always did. She said that when the Inspectors compared the self-study requirements with which the libraries are expected to comply with how the libraries meet these requirements in their self-study reports, the Inspectors have noted inconsistencies. One reason could be the contents of the self-study package. LPS personnel told us there is a consensus that the self-study package sent to librarians is overly complicated and, if a full response is made, takes too long to complete. The package has 28 pages covering eight categories to be reviewed and 128 questions, many of which are multi-part and require narrative answers.

As a result, some libraries have responded by not using the detailed package and instead provide very little information in their self-studies. For the 13 (of 15) libraries that showed evidence of self-studies in our audit’s random sample, we noted that 4 of them conducted a brief 2-page self-study report that was dated 1 to 2 years prior to the self-study evaluation date. We were also unable to locate letters of acknowledgement by LPS for these 4 libraries. For another 3 of the 13 libraries, self-study evaluation results noted that an inspection would be

³ Date of last inspection was obtained from the “Background” section of each sampled self-study evaluation, where it was specifically cited.

conducted. However, the inspection was not conducted until 9½ to 11 months afterwards.

Another requirement that generally is not being followed is the 90-day response timeframe. Our review disclosed the intended 90-day timeframe between self-study and inspection could take much longer. For example, our audit sample showed that the self-study evaluation of one depository library was completed on August 7, 2001. This evaluation indicated that it was non-compliant in two categories and was scheduled to have had an inspection conducted. However, as of June 2003, the on-site inspection had not been performed. The audit team found three other examples where a self-study evaluation resulted in letters to the libraries, dated between June and July 2002, informing them that an inspection would be forthcoming. However, our review indicated that only one of the three planned inspections had been performed as of June 2003.

Within GPO Instruction 825.18A *Internal Control Program*, Standard 7 states:

“Transactions should be promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports.”

The library inspection program has been constrained in recent years by a severe lack of Inspectors available to review self-studies and perform inspections. The Chief, Library Division, told us that there was only one Inspector available during FY's 2001 and 2002. Currently there are four Inspectors, including the Chief, Depository Services. The Chief, Library Division expressed the opinion that there was no correlation between the quantity of inspections and the quantity of probations. However, the most experienced staff Inspector told us that he has never placed a library on probation to date.

FINDING

Due to a lack of available inspection resources, the Inspectors' ability to perform significant quantities of on-site inspections has been reduced. Additionally, the self-reporting package may be unnecessarily lengthy. As a result, the frequency and quantity of library inspections and self-studies has been hampered.

However, there is another useful report required by Title 44 that covers most of the compliance areas. The Biennial Survey is prepared by depository libraries and received by LPS much more frequently. This Survey is required by Title 44 U.S.C. Section 1909, and its purpose is also to report on conditions in the depository libraries. The Biennial Survey gathers data from all depository libraries every 2 years, supplementing the more in-depth inspections or self-studies. We reviewed the accumulated “2001 Results” of the depository libraries and noted that 1,286 of the 1,292 applicable libraries responded, or 99.5 percent.

This is an important statistic, since the survey questions correspond to 7 of the 8 compliance categories SuDocs uses for self-studies and inspections.

The annual quantity of on-site library inspections has decreased since the self-study program began. This fact was anticipated due to the one of the premises of the self-study program, i.e. to limit the need for Inspectors to conduct on-site inspections. However, both the annual quantity and the average number of libraries being placed on probation since FY 1997 has also decreased significantly. We reviewed the LPS Monthly Output Statistics Report, an internal document that provided data from FY 1988 through 2003. The fourth quarter of FY 2003 was incomplete, as these statistics included annualized year-to-date performance data for the current year.

Statistics indicated that for FYs 1988 – 1996 (prior to results from initiation of the self-study program), the quantity of libraries placed on probation per fiscal year ranged from a low of 5 probations to a high of 19 probations, with an average of 11 probations per year. Since FY 1997, the quantity of libraries being placed on probation has ranged from a low of one probation per year (which occurred 3 times) to a high of 11 probations, with an average of 4 probations per year. Since initiation of the self-study program, the average number of annual probations has decreased by almost two-thirds. While the total quantity of libraries in the system has also continued to decrease, regardless of probation quantities, the effect of lessened probations cannot be determined. However, based on statistics prior to FY 1997, the auditors believe that increased inspections would probably lead to increased probations.

Lack of resources impacts another facet of the inspections program. Even when a library is placed on probation, an Inspector is usually unable to check back with a library to verify that the library has corrected unsatisfactory conditions within the 6-month timeline specified by Section 1909 of Title 44. Additional Inspector responsibilities and an inadequate data system impact their ability to do so. [Refer to Findings #3 and 4 for further details.] Thus the deadline loses its effect. Since GPO does not enforce the 6-month limit, the libraries' incentive to make immediate improvements is diminished and the overall process remains excessively long.

RECOMMENDATIONS

The Superintendent of Documents should take the necessary actions to:

- Construct and monitor an on-line database feature that will automatically notify management when the time span between individual library reviews (inspection or self-study) has become excessive. For example, libraries that have neither been inspected nor provided a self-study since prior to the onset of the self-study program in FY 1996 should be prioritized (0306-02);

- Streamline the inspection procedure by generating automatic reminder notices, via either letter or e-mail, which would notify libraries to keep in contact about progress being made with their current reporting requirements, such as the official six-month limit for responding to noncompliant category conditions (0306-03);
- Re-evaluate Supplement 3, “Self-Study of a Federal Depository Library,” and reduce the processes needed to evaluate each category (0306-04);
- Revise LPS’ operating procedures to highlight those libraries with previous non-compliance ratings, especially in multiple categories, so that on-site inspections of libraries having more serious problems can be prioritized (0306-05); and
- Enhance communication of library status by utilizing the data gathered from Biennial Surveys as a linkage to the self-study and inspection program, ensuring that it incorporates key compliance elements for the seven or eight compliance categories (0306-06).

MANAGEMENT COMMENTS

The Superintendent of Documents agreed with this finding and the five recommendations. Refer to Appendix I for specific comments.

3. TIME MANAGEMENT OF INSPECTORS CAN BE BETTER DOCUMENTED

BACKGROUND

At the time this fieldwork was conducted, there were three Inspectors and a supervisory inspector (the Chief, Depository Services) who also conducted inspections. According to LPS management, one new Inspector is scheduled to be hired by the end of October 2003.

FINDING

One Inspector is under the impression that Inspectors have out-of-state travel one week out of every quarter to conduct on-site inspections. However, according to our analysis of LPS procedures, this is not a formal or stated requirement. Another Inspector also claimed that although their field travel expenses are adequately reimbursed, they do not get credit for any time worked over a regular 8-hour day.

According to one of the Inspectors, a significant amount of their time is spent performing duties that do not pertain directly to library inspections. For example, inputting registrations for out-of-town librarians attending an annual national library conference in Washington, D.C. is a time-consuming assignment that is assigned to them. Inspectors are expected to provide this service to depository librarians throughout the depository library system, which totaled 1,281 libraries as of June 2003.

LPS provides its Inspectors with a set of in-house guidelines entitled "On The Road And In The Office: The Depository Inspector At Work" (revised as of September 2002). In a section entitled "Statistics," the guidelines state that Inspectors must maintain records of the libraries they inspect. The manual also refers to the need for inspectors to work overtime, but it is nonspecific regarding how much overtime or whether they will receive credit for it. Page 14 of the guidelines states:

"For most depositories, the inspector [sic] should last until mid-afternoon or later. On less frequent occasions, it may last only a matter of hours. Inspectors are required to put in a full day's work! In fact, good inspectors regularly work more than their allotted 40 hours per week."

When we asked about conference planning duties assigned to Inspectors, the Chief, Depository Services, stated that the Inspectors spend about 10 to 15 percent of their time planning conferences. The duty of performing program planning is listed as a secondary duty under their current job description.

When the audit team attempted to verify one Inspector's claim regarding overtime, we found that there was incomplete recording or tracking of their daily time. Inspectors do not have to document all the duties they work on each day nor how long they work on each duty. The Chief commented that if formal time sheets were instituted, it would limit the Inspectors to overtime pay only and preclude LPS management from allowing them any compensatory time. The Chief claimed that she previously has offered compensatory time to Inspectors.

GPO Instruction 640.7C *General Pay Administration* states in Section 1a., "Overtime," Subsection (4), "Irregular or Occasional Overtime, Printing Office Grade (PG) Employees," that:

"This is overtime which was not scheduled prior to the beginning of the administrative workweek in which it occurs. Compensatory time off in lieu of overtime will be granted to PG-14 and PG-15 employees...All other PG employees will receive overtime pay at the rate prescribed for their positions for any irregular or occasional overtime work that they perform."

Without a complete timekeeping process, Inspectors are unable to claim monetary credit for overtime hours worked on completing inspections. In addition, an Inspector told us that they perceive they are not being given the opportunity to provide input into the program, because they have never had a group meeting. We noted that of the current Inspector staff, only one of the three Inspectors has been at GPO for more than 2 years, and LPS management informed us that he was planning to retire soon. Additionally, if lower graded employees can perform conference-planning duties, it will leave Inspectors available to perform more frequent inspections.

RECOMMENDATIONS

The Superintendent of Documents should take the necessary actions to:

- Prepare updated standard written operating procedures that institute a complete time accountability form to be prepared by Inspectors, accounting for all hours worked, and reviewed by a supervisor on a regular (weekly, bi-weekly, or monthly) basis (0306-07);
- Pay overtime to Inspectors at grades below PG-14, according to GPO Instruction 640.7C, for overtime they work in the future (0306-08); and
- Monitors non-inspection work by Inspectors to assure it remains below a level of 10-15 percent, or consider having this work performed by lower-graded staff where available (0306-09.)

MANAGEMENT COMMENTS

The Superintendent of Documents agreed with this finding and the three recommendations. Refer to Appendix I for specific comments.

4. THE COMPUTER SYSTEM IN LPS NEEDS UPGRADING

BACKGROUND

LPS uses PAMALA (Profile Administration Management And Library Analysis) to input library information. A basic record is created using PAMALA when a depository library is designated. PAMALA provides basic information to Inspectors on libraries such as the depository number and address, the library type and size, the names of coordinators and directors, the designation type and year, and the web and e-mail addresses. One PAMALA file (known as LANYASIS, which is not an acronym) is used to determine what areas or states are to be notified that self-studies are required and that an on-site inspection is possible. PAMALA also populates other databases. Its data interfaces with GPO Access for a variety of functions, and is also used to generate name and address data for letters to alert libraries of upcoming self-studies. PAMALA also offers a sorting that can be performed by state and by inspector.

FINDING

The sorting that can be executed by PAMALA does not serve sufficient usefulness to the inspections process. PAMALA offers no help in distinguishing between self-studies and on-site inspections. We reviewed a listing we had requested of depository library inspections completed in the first six months of FY 2003. In order to determine which libraries were inspected (as opposed to which libraries had undergone self-study evaluation), the Chief, Depository Services, had to manually review the listing and make the distinctions based on her personal familiarity with the libraries.

LPS' in-house manual acknowledges some of PAMALA's limitations when compiling statistics. Inspectors are required to keep a record on a monthly calendar, with annotations separate from PAMALA of libraries they visit. Several other monthly statistics, including the number of libraries inspected, total number of libraries placed on probation, and the total number of self-studies reviewed and prepared, are to be compiled by the Inspector in the same manner. Moreover, PAMALA is installed on only one computer within Depository Services.

In the internal manual titled "On The Road And In The Office – The Depository Inspector At Work," LPS describes the important functions by which the Inspectors rely on the LANYASIS file of PAMALA. Inspectors are required to enter the important information concerning a library they just visited, because, according to the Manual, "...LANYASIS is the only record of note regarding current inspections."

The manual also states:

“As the information entered into LANYASIS will be used to determine future inspection cycles, analysis of inspection ratings and studied in the future by the inspectors prior to an inspection tour, it is extremely important that all inspectors enter accurate and complete information into the LANYASIS database. Inspectors should periodically review LANYASIS to insure that every inspection visit has been thoroughly documented.”

PAMALA contains a wealth of information per library, according to LPS managers. However, it has limited daily usefulness for Inspectors due to difficulties with data access. LPS management acknowledged that it could be 6 or 7 years before either a self-study or an inspection is performed. Yet, with the limited automated system currently in use, this time frame can continue to lengthen. The Chief, Depository Services, acknowledged that no libraries have prepared more than one self-study, as of the date of our fieldwork, since the program was instituted. The audit team reviewed the LPS Monthly Output Statistics Report as of June 2003 and noted that a grand total of 958 self-studies had been reported, which would represent 75 percent of the current total of 1,281 depository libraries as of June 2003 (this figure cannot necessarily be matched to the current total of libraries; note that some self-studies may have been performed by libraries that have left the program since the time of their report submission).

The self-study program is still at the point where it has not gone through one complete cycle of all 1,281 libraries. As a result, numerous depository libraries may not undergo an adequate review for many more years without the development of a sufficiently capable information system to help inspectors make appropriate distinctions. Inspectors must perform some of the critical work manually as a result of the lack of current updated automation. In order to distinguish self-studies from inspections, LPS relies on management experience and familiarity with manual files rather than an automated system that could offer sufficiently detailed information.

According to the Chief, Library Division, PAMALA was developed by a former GPO employee who used a now-outdated software package. The Branch does not have the resources at the present time to maintain or upgrade the system sufficiently.

RECOMMENDATIONS

The Superintendent of Documents should direct the Chief, Library Programs Service, to:

- Request enhancements or updates to PAMALA from Information Technology & Systems Department that will provide improved inspection report tracking (0306-10);
- Ensure that requested enhancements or updates to the current system will also allow for improved self-study report and self-study evaluation tracking (0306-11);
- Ensure that access to any new or enhanced system is installed on computers for each inspector in order to enable multiple accesses for greater efficiency (0306-12); and
- Review subsequent data entries into LANYASIS (or its replacement) by Inspectors, in compliance with LPS' internal manual requirements, to ensure complete, thorough, and accurate documentation of inspection visits (0306-13.)

MANAGEMENT COMMENTS

The Superintendent of Documents agreed with this finding and the four recommendations. Refer to Appendix I for specific comments.

MANAGEMENT COMMENTS